

REMARKS

The Office Action mailed October 31, 2007 (hereinafter "Office Action"), rejected Claims 1, 8-10, 24, 27, 28, 36, 42, and 45-50 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,023,679, issued to Acebo et al. (hereinafter "Acebo") in view of U.S. Patent No. 7,177,825, issued to Borders et al. (hereinafter "Borders"). Claims 2-7, 11, 12, 34, 35, and 44 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo in view of Borders and further in view of U.S. Patent Application Publication No. 2002/0082877, to Schiff et al. (hereinafter "Schiff"). Claims 13, 29, and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo in view of Borders in further view of U.S. Patent No. 6,094,640, issued to Goheen (hereinafter "Goheen"). Claims 14-17 and 51 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo in view of Borders and further in view of Goheen and U.S. Patent No. 5,953,706, issued to Patel (hereinafter "Patel").

Claims 18, 19, and 21-23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo in view of Borders and further in view of Patel. Claims 30-33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo in view of Borders and further in view of Goheen and further in view of Patel. Claim 20 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo in view of Borders and further in view of Patel and further in view of Schiff. Claims 37-41, 56-58, 60, and 61 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo in view of Borders and further in view of U.S. Patent No. 6,926,203, issued to Sehr (hereinafter "Sehr"). Claim 59 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo in view of Borders and further in view of Sehr and further in view of Patel. Claims 52, 53, and 55 were rejected under 35 U.S.C. § 103(a) as unpatentable over Acebo in view of Borders and further in view of Patel and Goheen and further in view of Sehr.

In view of the amendments to the pending claims, and for the reasons set forth below, applicants traverse the rejection and respectfully request reconsideration and allowance of the pending claims.

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Summary of the Disclosed Subject Matter

The disclosed subject matter generally relates to a system, method and computer-readable medium for processing reservation requests. Specifically, the disclosed subject matter maps one or more reservation requests into three levels of detail. The first level of detail utilized to describe a reservation request is a reservation transaction record. Each reservation transaction record can be associated with one or more reservation requests. A second level of detail utilized to define a reservation request is a reservation items record. Each reservation items record corresponds to a reservation transaction record and defines one or more inventory items, in some instances including dates, that are associated with a particular reservation request. A third level of detail utilized to define a reservation request is one or more reservation inventory records. Each reservation inventory record corresponds to a reservation items record or at least two reservation items records and is associated with an instance of an inventory item associated with the reservation request. Thus, the disclosed subject matter processes reservation requests for one or more inventory items utilizing the three levels of detail.

Summary of Acebo (U.S. Patent No. 6,023,679)

Acebo is purportedly directed toward a method for automatically generating travel reservation information for at least one traveler. As taught in Acebo, a computer reservation system (CRS) receives traveler identification information from each traveler, where each traveler is located at one or more locally operated computer systems. (Acebo, Col. 4, lines 42-49.) A passenger name record (PNR) is created from the information. (Col. 4, lines 54-56.) In conjunction, the CRS generates at least one potential travel itinerary for each traveler, at least one of which is subsequently selected and booked. (Col. 4, lines 56-58.) Information regarding the booked itinerary reservation is placed in the PNR. (Col. 4, lines 58-60.) The CRS creates an information management record (IMR) when the reservation is booked, including parsed

information from the PNR. (Col. 5, lines 17-19; Col. 9, lines 45-47.) The IMR is then transferred to a locally operated computer system. (Col. 5, lines 20-21.)

In one aspect, Acebo teaches a method for storing booked travel itinerary reservation information into two tables. The method includes the steps of accessing the booked travel itinerary information from the CRS. (Col. 6, lines 16-18.) All characteristics common to the travel transactions are stored into a common table on the locally operated computer system. (Col. 6, lines 17-21.) Additionally, information corresponding to uncommon characteristics, are stored in the locally operated computer system in detail tables. (Col. 6, lines 21-25.) A linking field associates the detail tables to the common table. (Col. 6, lines 25-26.) Thus, Acebo teaches a traditional two tiered information management system.

While Acebo discloses storing information into tables, Acebo fails to teach generating three levels of hierarchical detail as set forth in the pending claims, particularly: (at a first level) a reservation transaction record corresponding to a user reservation request; (at a second level) one or more reservation items records corresponding to inventory identified in the user reservation request; and (at a third level) at least one reservation inventory record for each reservation items record that identifies a specific reservation instance for the corresponding inventory item.

Summary of Borders

Borders is directed to a technique for effecting electronic commerce using a data network. Specifically, there is an inventory subsystem that includes an inventory database configured to maintain inventory records. When a customer wants to place an order, a publishing system in Borders manages the inventory in a tiered tree structure. For example, Borders describes the system associating each inventory item with a SKU, regardless of whether the item is available for customer purchase, for example, a 16-ounce Brand X potato chips is an inventory item. (Borders, Col. 9, lines 25-27.) The next tree level is a grouping of inventory

items called a product, for example, Brand X potato chips is a product. (Col. 9, lines 27-34.) The next and top level of the tree is called a category and includes groupings of products, for example, the product Brand X potato chips belongs to the category of potato chips. (Col. 9, lines 30-37.)

Despite purportedly disclosing a hierarchical structure for storing and managing inventory items, Borders fails to disclose a hierarchical organization as set forth in the pending claims, including: a reservation transaction record; one or more reservation items records for the reservation transaction record corresponding to inventory identified in a user reservation request; and one or more reservation inventory records for each reservation items record and corresponding to a specific reservation instance for the inventory item identified in the reservation inventory record.

Rejection of Claims 1, 8-10, 24, 27, 28, 36, 42, and 45-50 Under 35 U.S.C. § 103(a)

As indicated above, Claims 1, 8-10, 24, 27, 28, 36, 42, and 45-50 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo in view of Borders

Claim 1

Applicants traverse the 35 U.S.C. § 103(a) rejection and submit that Acebo and Borders, alone and in combination, fail to form the basis of a *prima facie* case of obviousness regarding Claim 1.

Claim 1 recites, *inter alia*:

generating three levels of detail organized in a hierarchical relationship for the user request for reservation defined by a reservation transaction record, one or more reservation items records, and for each reservation items record one or more reservation inventory records corresponding to the matching inventory data;

wherein the reservation transaction record defines a first level of detail in the hierarchical relationship corresponding to the user request for reservation;

wherein each reservation items record defines a second level of detail in the hierarchical relationship that corresponds to the reservation transaction

record and identifies a specific inventory item associated with the user request for reservation; and

wherein each reservation inventory record defines a third level of detail in the hierarchical relationship that corresponds to the specific inventory item of a reservation items record and includes data associated with a reservation instance of the specific inventory item.

Applicants agree with the Office Action that Acebo fails to disclose storing information three levels of detail. However, Applicants traverse the assertion that it would have been obvious to modify Acebo to create three levels of hierarchical detail. Indeed, the motivation to modify Acebo - efficient data retrieval - is both addressed and satisfied within Acebo through the use of a database and related records. See, Acebo, Col. 12, lines 4-9. Moreover, nothing in Acebo discloses a hierarchical organization for a reservation request that includes a first level corresponding to the reservation request, a second level corresponding to inventory items to satisfy the reservation request, and a third level of inventory instances for each inventory item storing reservation one or more reservation instances. This level of detail and organization is not found in Acebo and was not contemplated by merely placing the information in a database.

While Borders may disclose information regarding a hierarchical organization or grouping of inventory items, Borders fails to disclose generating three levels of hierarchical data corresponding to a user's reservation request as set forth above.

In view of the above, applicants submit that Acebo and Borders, alone and in combination, fail to disclose each element of Claim 1. Applicants note that the key to supporting any rejection under 35 U.S.C. § 103(a) is the clear articulation of the reason(s) why the claimed invention would have been obvious. See, M.P.E.P § 2143. See also, *KSR International Co. v. Teleflex Inc.*, 550 U.S. ___, ___, 82 USPQ2d 1385, 1395-97 (2007). The motivation provided by the Office Action to modify Acebo from storing information in a relational database to generating three levels of hierarchical data with particular requirements for each element is merely a general allegation of efficiency and not a clear articulation as to why the substantial modification of Acebo to the particularity of the invention recited in Claim 1 would have been

obvious to one of ordinary skill in the art. Accordingly, applicants submit that Acebo and Borders, alone and in combination, fail to form the basis for a proper *prima facie* case of obviousness and request that the 35 U.S.C. § 103(a) rejection be withdrawn and the claim allowed.

Claims 8-10 and 24

Dependent Claims 8-10 and 24 depend from independent Claim 1. As Claim 1 is in condition for allowance, applicants submit that dependent Claims 8-10 and 24 are also in condition for allowance and request that the 35 U.S.C. § 103(a) rejections be withdrawn and the claims allowed.

Claim 27

Independent Claim 27 recites subject matter similar to that discussed above in regard to Claim 1. In particular, Claim 27 recites, *inter alia*:

wherein the travel server generates and processes at least one reservation transaction record defining at least three levels of hierarchical data including:

a reservation transaction record defining a first level of detail of the hierarchical data and associated with the reservation request,

one or more reservation items records defining a second level of detail of the hierarchical data corresponding to the reservation transaction record, each reservation transaction record being associated with a particular inventory item identified by the reservation request, and

one or more reservation inventory records defining a third level of detail of the hierarchical data, each reservation inventory record corresponding to the specific inventory item of a reservation items record and including data identifying a reservation instance of the specific inventory item such that at least one reservation inventory record is generated for each reservation items record.

As indicated above, Acebo and Borders, alone and in combination, fail to disclose the particular hierarchical organization of detail generated for a user reservation request. Moreover, there is no clear articulation, just general allegations of efficiency, as to why one of ordinary skill

in the art would modify Acebo to alternatively generate three levels of hierarchical data with the particular requirements as set forth in Claim 27. Accordingly, applicants submit that Acebo and Borders, alone and in combination, fail to form the basis for a proper *prima facie* case of obviousness and request that the 35 U.S.C. § 103(a) rejection be withdrawn and the claim allowed.

Claim 28

Dependent Claim 28 depends from independent Claim 27. As Claim 27 is in condition for allowance, applicants submit that dependent Claim 28 is also in condition for allowance and request that the 35 U.S.C. § 103(a) rejection be withdrawn and the claim allowed.

Claim 42

Independent Claim 42 recites subject matter similar to that discussed above in regard to Claim 1. In particular, Claim 42 recites, *inter alia*:

three levels of detail organized in a hierarchical relationship defined by a reservation transaction component, one or more reservation items components, and for each reservation items component one or more reservation inventory components corresponding to inventory items;

wherein the reservation transaction component defines a first level of detail in the hierarchical relationship operable to identify a reservation request for inventory items;

wherein each reservation items component defines a second level of detail in the hierarchical relationship, organized according to date information associated with the reservation items, corresponding to the reservation transaction component and operable to identify a specific inventory item of the inventory items associated with the reservation request; and

wherein each reservation inventory component defines a third level of detail in the hierarchical relationship identifying a reservation instance of the specific inventory item of an associated reservation items component.

As indicated above, Acebo and Borders, alone and in combination, fail to disclose the particular hierarchical organization of detail generated for a user reservation request. Moreover,

there is no clear articulation, just general allegations of efficiency, as to why one of ordinary skill in the art would modify Acebo to alternatively generate three levels of hierarchical data with the particular requirements as set forth in Claim 42. Accordingly, applicants submit that Acebo and Borders, alone and in combination, fail to form the basis for a proper *prima facie* case of obviousness and request that the 35 U.S.C. § 103(a) rejection be withdrawn and the claim allowed.

Claims 45-49

Dependent Claims 45-49 were rejected as being obvious in view of Acebo and Borders. However, Claims 45-49 depend from independent Claim 42, and as Claim 42 is in condition for allowance, applicants submit that dependent Claims 45-49 are also in condition for allowance. Accordingly, applicants request that the 35 U.S.C. § 103(a) rejections be withdrawn and the claims allowed.

Claim 50

While of different scope, independent Claim 50 recites subject matter similar to that discussed above in regard to Claim 1 as well as the other independent claims. In particular, Claim 50 recites, *inter alia*:

obtaining three levels of detail organized in a hierarchical relationship defined by pre-existing reservation transaction records, reservation items records, and reservation inventory records corresponding to the inventory item;

wherein each reservation transaction record defines a first level of detail in the hierarchical relationship associated with a reservation request;

wherein the one or more reservation items records define a second level of detail in the hierarchical relationship, including date information associated with the reservation items, that corresponds to the reservation transaction records and wherein each reservation items record identifies an inventory item associated with the specific reservation request, and wherein for each reservation transaction record there is at least one reservation items record; and

wherein the one or more reservation inventory records define a third level of detail in the hierarchical relationship, wherein each reservation inventory record identifies a reservation instance of the specific inventory item of an associated reservation items component, and wherein for each reservation items record there is at least one reservation inventory record;

As indicated above, Acebo and Borders, alone and in combination, fail to disclose the particular hierarchical organization of detail generated for a user reservation request. Moreover, there is no clear articulation, just general allegations of efficiency, as to why one of ordinary skill in the art would modify Acebo to alternatively generate three levels of hierarchical data with the particular requirements as set forth in Claim 42. Accordingly, applicants submit that Acebo and Borders, alone and in combination, fail to form the basis for a proper *prima facie* case of obviousness and request that the 35 U.S.C. § 103(a) rejection be withdrawn and the claim allowed.

35 U.S.C. § 103(a) Rejections of Claims 2-7, 11, 12, 34, and 44

As indicated above, Claims 2-7, 11, 12, 34, 35, and 44 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo in view of Borders and further in view of Schiff. However, when read in combination with their independent claims, Acebo and Borders fail to disclose each element of Claims 2-7, 11, 12, 34, 35, and 44.

Schiff was relied upon as disclose the various additional elements of Claims 2-7, 11, 12, 34, 35, and 44. Irrespective of whether Schiff discloses these elements, applicants submit that Schiff fails to amend the deficiencies of Acebo and Borders to the independent claims from which they depend. Accordingly, irrespective of the teachings of Schiff, applicants submit that Claims 2-7, 11, 12, 34, 35, and 44 are in condition for allowance and request that the 35 U.S.C. § 103(a) rejections be withdrawn and the claims allowed.

35 U.S.C. § 103(a) Rejections of Claims 13, 29, and 43

As indicated above, Claims 13, 29, and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo in view of Borders in further view of Goheen. However,

irrespective of whether Goheen discloses the particular elements of Claims 13, 29, and 43, when read in combination with the elements of their independent claims, applicants submit that Goheen fails to make up the deficiencies of Acebo and Borders. Accordingly, applicants submit that Claims 13, 29, and 43 are in condition for allowance and request that the 35 U.S.C. § 103(a) rejections be withdrawn and the claims allowed.

35 U.S.C. § 103(a) Rejections of Claims 14-17, 30-33, and 51

Claims 14-17, 30-33, and 51 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo, Borders, and in further view of Patel and Goheen. However, irrespective of whether Patel and Goheen disclose the additional particular elements of Claims 14-17 and 51, when read in combination with the elements of their independent claims, applicants submit that Goheen and Patel fail to make up the deficiencies of Acebo and Borders. Accordingly, applicants submit that Claims 14-17, 30-33, and 51 are in condition for allowance and request that the 35 U.S.C. § 103(a) rejections be withdrawn and the claims allowed.

35 U.S.C. § 103(a) Rejections of Claims 18, 19, and 21-23

Claims 18, 19, and 21-23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo, Borders, and Patel. However, irrespective of whether Patel discloses the additional particular elements of Claims 18, 19, and 21-23, when read in combination with the elements of independent Claim 1, applicants submit that Patel fails to make up the deficiencies of Acebo and Borders. Accordingly, applicants submit that Claims 18, 19, and 21-23 are in condition for allowance and request that the 35 U.S.C. § 103(a) rejections be withdrawn and the claims allowed.

35 U.S.C. § 103(a) Rejection of Claim 20

Claim 20 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo, Borders, Patel, and Schiff. However, irrespective of whether Patel and Schiff disclose the

additional particular elements of Claim 20, when read in combination with the elements of independent Claim 1, applicants submit that Patel and Schiff fail to make up the deficiencies of Acebo and Borders. Accordingly, applicants submit that Claim 20 is in condition for allowance and request that the 35 U.S.C. § 103(a) rejection be withdrawn and the claims allowed.

35 U.S.C. § 103(a) Rejections of Claims 37-41, 56-58, 60, and 61

Claims 37-41, 56-58, 60, and 61 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo, Borders, and Sehr. However, irrespective of whether Sehr discloses the additional particular elements of Claims 37-41, 56-58, 60, and 61, when read in combination with the elements of their independent claims, applicants submit that Sehr fails to make up the deficiencies of Acebo and Borders. Accordingly, applicants submit that Claims 37-41, 56-58, 60, and 61 are in condition for allowance and request that the 35 U.S.C. § 103(a) rejections be withdrawn and the claims allowed.

Rejection of Claim 59 Under 35 U.S.C. § 103(a)

Claim 59 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo, Borders, Sehr, and Patel. However, irrespective of whether Patel and Sehr disclose the additional particular elements of Claim 59, when read in combination with the elements of independent Claim 50, applicants submit that Patel and Sehr fails to make up the deficiencies of Acebo and Borders. Accordingly, applicants submit that Claim 59 is in condition for allowance and request that the 35 U.S.C. § 103(a) rejection be withdrawn and the claims allowed.

35 U.S.C. § 103(a) Rejection of Claims 52, 53, and 55

Claims 52, 53, and 55 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Acebo, Borders, Patel, Goheen, and Sehr. However, irrespective of whether Sehr discloses the additional particular elements of Claims 52, 53, and 55, when read in combination with the elements of their independent claims, applicants submit that Sehr fails to make up the

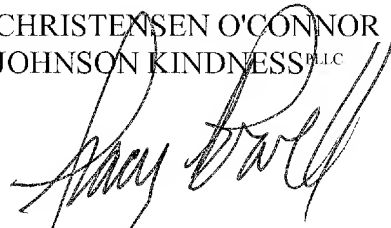
deficiencies of Acebo and Borders. Accordingly, applicants submit that Claims 52, 53, and 55 are in condition for allowance and request that the 35 U.S.C. § 103(a) rejections be withdrawn and the claims allowed.

CONCLUSION

The foregoing amendment and response is submitted as a full and complete response to the Office Action mailed October 31, 2007. If the Examiner believes that there are any issues that can be resolved by a telephone conference or that there are any informalities that can be corrected by an Examiner's amendment, please feel free to call applicants' undersigned attorney at the number set forth below.

Respectfully submitted,

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